

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CAITLIN O'CONNOR,)
) Case No. 3:20-cv-00628
Plaintiff,)
) District Judge Richardson
v.)
) Magistrate Judge Frensley
THE LAMPO GROUP, LLC,)
) Jury Demand
Defendant.)

DEFENDANT'S AMENDED MOTION FOR EXTENSION OF TIME¹

Defendant, The Lampo Group, LLC, by and through the undersigned counsel and pursuant to Rule 16 of the Federal Rules of Civil Procedure, moves the Court to extend its deadline to comply with the Court's Sealed Order dated August 18, 2022 (Doc. #90). In support of this motion, Defendant states the following:

1. The Court's Sealed Order directs Defendant to file redacted copies of certain documents that the parties filed in connection with summary judgment briefing.
2. Defendant's deadline to comply with the Court's Sealed Order was August 31, 2022.
3. Defendant timely filed redacted copies of Docs. #76-2, 76-3, 76-4, 76-5, 76-6, 76-9, 76-10, 76-11, 76-12, and 76-13 on August 31, 2022. *See* Doc. #93.
4. Due to technical difficulties, Defendant was not able to file redacted copies of Docs. #74, 75, 76-14, 76-15, 76-16, 76-17, 76-18, 76-19, 76-21 to 76-25, 78, and 82 until 1:26AM on September 1, 2022. *See* Doc. #94.
5. With respect to Docs. #76-29 and 76-30, Defendant does not have copies of those

¹ This Motion is intended to supersede the Motion for Extension of Time filed by Defendant on August 31, 2022 (Doc. #92)

documents with Plaintiff's proposed redactions.² Defendant has requested those documents from Plaintiff and will file redacted copies promptly upon receipt.

6. With respect to Doc. #76-20, Defendant has questions about how to comply with the Court's Sealed Order. Defendant has filed a Motion for Instructions from the Court (Doc. #91). Upon receipt of instructions from the Court, Defendant will promptly file a redacted copy of Doc. #76-20.

Therefore, Defendant asks the Court to extend Defendant's deadline to comply with the Court's Sealed Order (Doc. #90) to seven (7) days after the Court resolves Defendant's Motion for Instructions (Doc. #91).

Respectfully submitted,

/s/Daniel Crowell

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Attorneys for Defendant

² Defendant's counsel moved to a new law firm during this case and are still transitioning files from the old firm to the new firm. Upon information and belief, Docs. #76-29 and 76-30 with Plaintiff's proposed redactions have still not been transitioned.

CERTIFICATE OF SERVICE

I certify that, on September 1, 2022, I filed *Defendant's Amended Motion for Extension of Time* via the Court's electronic filing system, which will automatically notify and send a copy of that filing to:

Heather Moore Collins
Ashley Shoemaker Walter
HMC Civil Rights Law, PLLC

Attorneys for Plaintiff

/s/Daniel Crowell
Daniel Crowell (TN #31485)
Attorney for Defendant